

# EXHIBIT G

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

CHARLENE CARTER,

Plaintiff,

vs.

TRANSPORT WORKERS UNION OF  
AMERICA, LOCAL 556,

Defendant.

CIVIL ACTION NO.

3:17-cv-02278-B

JURY DEMANDED

**PRIVILEGE LOG**

1. Attorney-Client Privilege

Asserted to withhold all documents/files because legal counsel was the sender or recipient of the document/file to Defendant TWU Local 556's officers/employees, or because legal counsel was one of the senders/recipient of such document/file.

1,216 documents/files withheld because of attorney-client privilege.

2. Work Product Privilege

Counsel for Defendant TWU Local 556 and its grievance team managers began in 2010 developing a systematic process for grievance handling/processing, requiring documentation of calls, meetings internally and with Southwest Airlines Company (SWA) (Fact Finding and Step Two meetings). Notes were taken of such meetings and documented in the FA grievance file, pursuant to legal advice of counsel.

This system continued to be refined and now includes the compiling of a report to the Executive Board ("Board Packet") which summarizes the grievance team's investigation and the position of SWA regarding each grievance.

All of the above steps are and were taken pursuant to advice of counsel in an effort to insure grievances were handled in good faith, without discrimination non-arbitrary in nature, in order to explain, and if need be, defend TWU Local 556's actions on each grievance in potential litigation.

Withheld: 69 files (as follows):

- No. 2.B. Grievance Reports/Status Reports/Grievance Team notes for fact finding meetings and reports/Step Two notes/Board Packets from Grievance Team (51 files).
- No. 15.A-I. Grievance file notes/summaries/correspondence to/from grievant (14 files).
- Nos. 18-20 Board Packets from Grievance Team/Grievance Team notes/Step Two exhibits (4 files).

Respectfully submitted,

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COUNSEL FOR DEFENDANT

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing instrument has been served upon the below-listed counsel of record, via the U.S. District Court, Northern District=s CM/ECF system on \_\_\_\_\_, 2019:

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/s/ Adam S. Greenfield \_\_\_\_\_

Adam S. Greenfield

Edward B. Cloutman, III